IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASTELLAS PHARMA INC., ASTELLAS IRELAND CO., LTD. and ASTELLAS PHARMA GLOBAL DEVELOPMENT, INC.,	)	
Plaintiffs,	)	
v.	)	C.A. No. 16-905 (SLR)
	)	CONSOLIDATED
ACTAVIS ELIZABETH LLC and ACTAVIS LLC, *et al.*,	)	
Defendants.	)	

STIPULATION AND PROPOSED ORDER

Plaintiffs/Counterclaim Defendants Astellas Pharma Inc., Astellas Ireland Co., Ltd., and Astellas Pharma Global Development, Inc. and Defendants/Counterclaim-Plaintiffs Actavis Elizabeth LLC and Actavis LLC, Lupin Ltd. and Lupin Pharmaceuticals, Inc., Zydus Pharmaceuticals (USA), Inc. and Cadila Healthcare Ltd., Windlas Healthcare, PVT. Ltd. and Windlas Biotech Ltd., Aurobindo Pharma Ltd., Aurobindo Pharma USA, Inc. and Aurolife Pharma LLC, Prinston Pharmaceutical Inc., Sandoz Inc., Sawai Pharmaceutical Co., Ltd. and Sawai USA, Inc., Apotex Inc. and Apotex Corp., hereby stipulate and agree, subject to the approval of the Court, as follows:

1. The time for the parties to negotiate concerning the Court's "Default Standard for Discovery, Including Discovery of Electronically Stored Information ("ESI")," is extended until April 24, 2017.

2. The time for the parties to exchange their initial disclosures pursuant to 2(c)(1) of the scheduling order (D.I. 25) is extended until April 24, 2017.

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SO ORDERED this _____ day of March 2017.

_____

J.